

JAP:UAD

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

MARGARET GONZALEZ,
MAYRA GONZALEZ and
LOUIS ANTIGUA,

Defendants.

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EASTERN DISTRICT OF NEW YORK, SS:

ERIC SHEEN, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), duly appointed according to law and acting as such.

Upon information and belief, in or about and between February 2010 and June 2010, both dates being approximate and inclusive, within the Eastern District of New York, the defendants MARGARET GONZALEZ, MAYRA GONZALEZ and LOUIS ANTIGUA, together with others, did knowingly and wilfully conspire to steal and convert to their own use things of value of the United States and a department and agency thereof, to wit: Internal Revenue Service and Department of Treasury tax refund checks, the value of which exceeded \$1,000, contrary to Title 18, United States Code, Section 641.

(Title 18, United States Code, Section 371)

M-11-773

COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANTS

(T. 18, U.S.C. § 371)

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

1. On June 2010, fraud investigators hired by Pay-O-Matic, a check-cashing company located in Brooklyn, informed USPIS that Pay-O-Matic management had become aware of a small number of individuals cashing a large number of United States Treasury tax refund checks ("tax refund checks") under different names. These individuals appeared to be using fraudulent New York State Benefits Identification cards in order to cash the checks.

2. Investigation also revealed that one Pay-O-Matic employee, the defendant MARGARET GONZALEZ, processed approximately ninety-eight (98) of the tax refund checks, in amounts totaling approximately \$599,232.20. Another employee, the defendant MAYRA GONZALEZ, processed approximately fifty-two (52) of the tax refund checks, in amounts totaling approximately \$318,496.25.

3. Investigation, including review of video surveillance captured by Pay-O-Matic, also revealed that one of the individuals who cashed the tax refund checks at Pay-O-Matic using fraudulent identities is the defendant LOUIS ANTIGUA. ANTIGUA cashed approximately thirty-two (32) tax refund checks totaling approximately \$188,714.74 between February 2010 and June 2010.

^{1/} Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

4. On or about July 13, 2010, the defendants MARGARET and MAYRA GONZALEZ were arrested by the New York City Police Department for their participation in this fraudulent scheme. They were advised of their Miranda rights, which they indicated that they understood and agreed to waive. They each admitted, in sum and substance, to agreeing to participate and participating in the scheme and stated that the defendant LOUIS ANTIGUA had recruited them.

WHEREFORE, your deponent respectfully requests that the court issue arrests warrants for the defendants MARGARET GONZALEZ, MAYRA GONZALEZ and LOUIS ANTIGUA so that they may be dealt with according to law.

WHEREFORE, your deponent also respectfully requests that this affidavit and the arrest warrants be filed under seal until execution of the arrest warrants. Providing prior notice to the defendants of this affidavit and the arrest warrants would jeopardize the ongoing investigation, as such a disclosure would give the defendants an opportunity to flee from prosecution and destroy evidence.



ERIC SHEEN
Postal Inspector-USPIS

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The
Uni
Eastern District of New York

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